

CHAITMAN LLP

Helen Davis Chaitman

hchaitman@chaitmanllp.com

465 Park Avenue

New York, New York 10022

Phone & Fax: 888-759-1114

Hearing: May 31, 2017 at 10 a.m.

Attorneys for Defendant

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff,

Plaintiff,

v.

BRUNO L. DI GIULIAN,

Defendant.

Adv. Pro. No. 10-04728 (SMB)

DECLARATION OF HELEN DAVIS CHAITMAN

I, Helen Davis Chaitman, hereby declare, as follows:

1. I am a partner with Chaitman LLP, counsel to Defendant, (“Defendant”). I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in opposition to Trustee’s Motion for Substitution of Defendant and in support of Defendant’s Cross-Motion to Dismiss Complaint.

3. Attached hereto as **Exhibit A** is a true and accurate copy of emails dated January 13, 2016.

4. I hereby declare under the penalty of perjury that the foregoing statements made by me are true and correct.

Dated: New York, New York
May 23, 2017

/s/ Helen Davis Chaitman
Helen Davis Chaitman